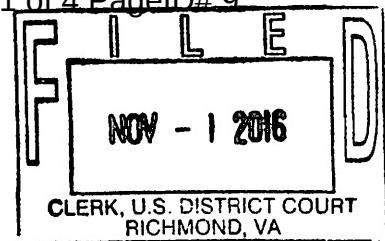


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



UNITED STATES OF AMERICA) Criminal No. 3:16CR 109
v.)
RICHARD TODD HAAS,) 18 U.S.C. § 1591(a)(1)
Defendant.) Sex Trafficking of a Child
) (Count One)
) 18 U.S.C. § 2252A(a)(2)(A)
) Receipt of Child Pornography
) (Count Two)
) 18 U.S.C. § 2252A(a)(5)(B)
) Possession of Child Pornography
) (Counts Three, Four, and Five)
) 18 U.S.C. § 2253
) Forfeiture Notice

INDICTMENT

November 2016 Term — At Richmond, Virginia.

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Sex Trafficking of a Child)

From in or about May 2016 to August 13, 2016, in the Eastern District of Virginia, the defendant, RICHARD TODD HAAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, and solicited by any means a person knowing that the person had not attained the age of 18 years of age and would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Section 1591(a)(1))

COUNT TWO
(Receipt of Child Pornography)

On or about July 19, 2016, in the Eastern District of Virginia, the defendant, RICHARD TODD HAAS, knowingly received child pornography, as defined by 18 U.S.C. § 2256, to wit: one video file entitled “FM_Ceja-White-Hilo.wmv,” which depicts an actual child engaged in sexually explicit conduct, specifically a prepubescent female engaged in the lascivious exhibition of the genitals; that had been mailed, and, using any means or facility of interstate or foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2)(A))

COUNT THREE
(Possession of Child Pornography)

On or about September 1, 2016, in the Eastern District of Virginia, the defendant, RICHARD TODD HAAS, knowingly possessed child pornography, as defined by 18 U.S.C. § 2256, to wit: one image file entitled “0036.jpg,” which depicts an actual child engaged in sexually explicit conduct, specifically a prepubescent female engaged in sadistic or masochistic abuse, the lascivious exhibition of the genitals, and simulated genital-genital sexual intercourse, that had been mailed, and, using any means or facility of interstate or foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; or that was produced using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(5)(B))

COUNT FOUR
(Possession of Child Pornography)

On or about September 1, 2016, in the Eastern District of Virginia, the defendant, RICHARD TODD HAAS, knowingly possessed child pornography, as defined by 18 U.S.C. § 2256, to wit: one image file entitled “1189039333600.jpg,” which depicts an actual child engaged in sexually explicit conduct, specifically a prepubescent female engaged in the lascivious exhibition of the genitals, that had been mailed, and, using any means or facility of interstate or foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; or that was produced using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(5)(B))

COUNT FIVE
(Possession of Child Pornography)

On or about September 1, 2016, in the Eastern District of Virginia, the defendant, RICHARD TODD HAAS, knowingly possessed child pornography, as defined by 18 U.S.C. § 2256, to wit: one video file entitled “babshivid-notmyassagaindad01(withsound_PTHC pedo rape anal).avi,” which depicts an actual child engaged in sexually explicit conduct, specifically a prepubescent female and adult male engaged in sadistic and masochistic abuse, actual or simulated masturbation, and the lascivious exhibition of the genitals, that had been mailed, and, using any means or facility of interstate or foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; or that was

produced using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(5)(B))

FORFEITURE NOTICE

Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, the defendant is hereby notified that, if convicted of any of Counts One through Five, the defendant shall forfeit to the United States his interest in any visual depiction produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Sections 2251 *et seq.*, and any property, real or personal, constituting or traceable to gross profits or other proceeds or used or intended to be used to commit or promote the commission of such offense(s), including, but not limited to the following:

One (1) Gateway laptop computer, S/N NXY1UAA030323099603400, including internal hard drives and associated peripheral equipment (*i.e.*, keyboard, mouse, monitor, cables);

One (1) 700 MB Staples CDR.

(In accordance with Title 18, United States Code, Section 2253).

A TRUE BILL:

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

Samuel E. Fishe^{IV}
Special Assistant United States Attorney